

EXHIBIT 67

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Bonus Taxi Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 1632TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: Raul E. Cuzco, for \$23,100 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name

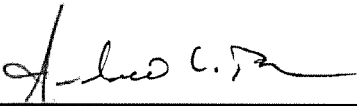
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee

Bonus Taxi Inc., by certified mail, return receipt requested on this 16th day of August, 2018.
List Debtor Licensee Name

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP

Law Firm

875 Third Avenue, New York, NY 10022

Address

212-704-6000

Phone

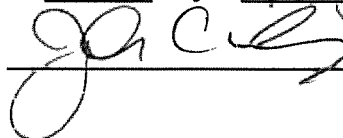
andrew.buck@troutman.com

Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 1632TX

LICENSEE NAME: Bonus Taxi Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 1632TX either individually or through a company that I own and I have a defense to the foreclosure of these
licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Bonus Taxi Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 2346TX, 1949TX, 1907TX & 1683TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

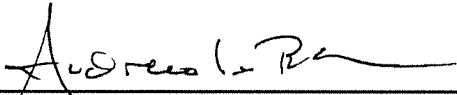
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Bonus Taxi Inc., by certified mail, return receipt requested on this 16th day of August, 2018.
List Debtor Licensee Name

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

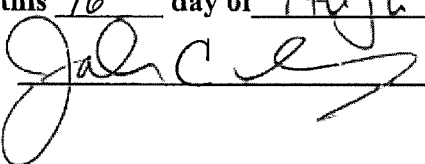
875 Third Avenue, New York, NY 10022
Address

212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified in Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 2018.

Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 2346TX, 1949TX, 1907TX & 1683TX

LICENSEE NAME: Bonus Taxi Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 2346TX, 1949TX, 1907TX & 1683TX either individually or through a company that I own and I have a
defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Chicago Polo I, Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 1106TX, 2550TX, 6607TX, 6608TX & 6609TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Chicago Polo I, Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,

Andrew C. Buck
Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 2018.

[Signature]
Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 1106TX, 2550TX, 6607TX, 6608TX & 6609TX

LICENSEE NAME: Chicago Polo I, Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 1106TX, 2550TX, 6607TX, 6608TX & 6609TX either individually or through a company that I own and I
have a defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Chicago Polo I, Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 6610TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: Okwabo T. Papafio, for \$23,100 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN **FIFTEEN (15) DAYS** FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name

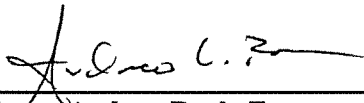
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee

Chicago Polo I, Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

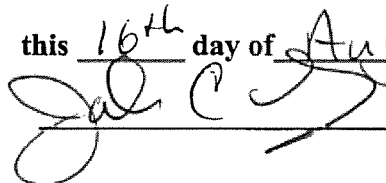
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 6610TX

LICENSEE NAME: Chicago Polo I, Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 6610TX either individually or through a company that I own and I have a defense to the foreclosure of these
licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Chicago Polo II, Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 6612TX, 6613TX, 6614TX, 6615TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

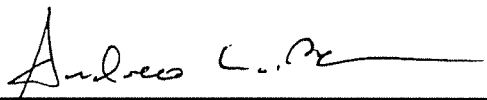
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Chicago Polo II, Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

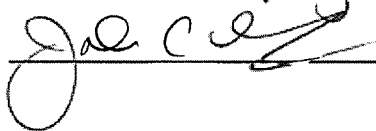
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 6612TX, 6613TX, 6614TX, 6615TX

LICENSEE NAME: Chicago Polo II, Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name
Number(s) 6612TX, 6613TX, 6614TX, 6615TX either individually or through a company that I own and I have a defense
to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure
sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Chicago Polo II, Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 6616TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: Samuel Papa Brafo, for \$23,100 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

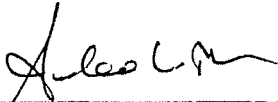
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Chicago Polo II, Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

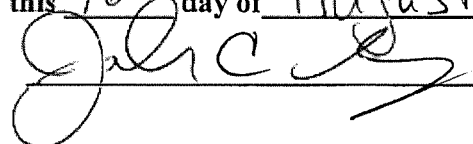
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 6616TX

LICENSEE NAME: Chicago Polo II, Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 6616TX either individually or through a company that I own and I have a defense to the foreclosure of these
licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: Via Regular and Certified Mail

Chicago Polo II, Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 6611TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: Maxwell Anokye, for \$23,100 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name

Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee

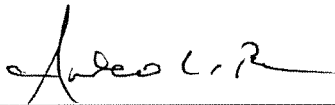
Chicago Polo II, Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name

2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

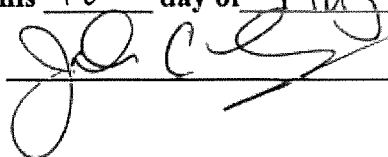
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 2018.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 6611TX

LICENSEE NAME: Chicago Polo II, Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 6611TX either individually or through a company that I own and I have a defense to the foreclosure of these
licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Chicago Polo III, Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 6267TX, 6279TX, 6220TX, 6208TX, 5414TX & 1128TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name

Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee

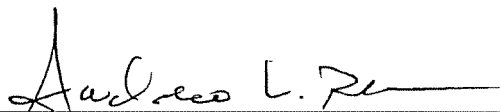
Chicago Polo III, Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name

2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

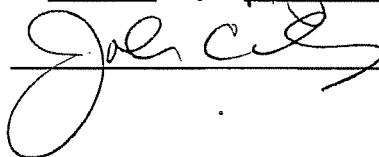
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 6267TX, 6279TX, 6220TX, 6208TX, 5414TX & 1128TX

LICENSEE NAME: Chicago Polo III, Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 6267TX, 6279TX, 6220TX, 6208TX, 5414TX & 1128TX either individually or through a company that I own
and I have a defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure
sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Chicago Polo IV, Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 2848TX, 3454TX, 3678TX, 3700TX, 5795TX & 6014TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name

Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee


Chicago Polo IV, Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name

2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,


Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

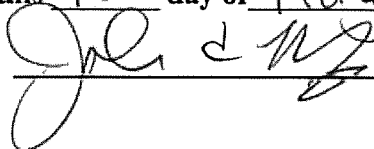
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 2848TX, 3454TX, 3678TX, 3700TX, 5795TX & 6014TX

LICENSEE NAME: Chicago Polo IV, Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 2848TX, 3454TX, 3678TX, 3700TX, 5795TX & 6014TX either individually or through a company that I own
and I have a defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure
sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Chicago Polo XII, Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 1535TX, 1550TX, 1589TX, 1599TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name

Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee

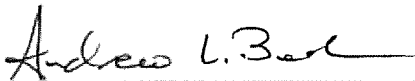
Chicago Polo XII, Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name

2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

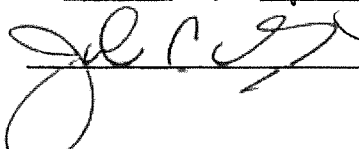
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 1535TX, 1550TX, 1589TX, 1599TX

LICENSEE NAME: Chicago Polo XII, Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 1535TX, 1550TX, 1589TX, 1599TX either individually or through a company that I own and I have a defense
to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Dolfina Taxi Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 6461TX, 5756TX, 5313TX & 2460TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Dolfina Taxi Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,

Andrew L. Buck
Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me
this 16th day of August, 20 18.
John C. Murphy
Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 6461TX, 5756TX, 5313TX & 2460TX

LICENSEE NAME: Dolfina Taxi Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 6461TX, 5756TX, 5313TX & 2460TX either individually or through a company that I own and I have a
defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Enetochka Taxi Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 3688TX, 2080TX, 2053TX & 2027TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name

Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee

Enetochka Taxi Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name

2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP

Law Firm

875 Third Avenue, New York, NY 10022

Address

212-704-6000

Phone

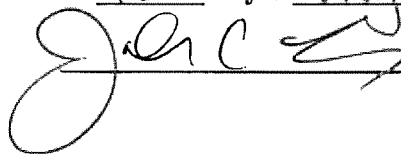
andrew.buck@troutman.com

Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 3688TX, 2080TX, 2053TX & 2027TX

LICENSEE NAME: Enetochka Taxi Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 3688TX, 2080TX, 2053TX & 2027TX either individually or through a company that I own and I have a
defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 195TX, 202TX, 198TX & 203TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

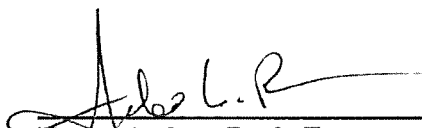
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Funny Monica In Chicago, Inc., by certified mail, return receipt requested on this 16th day of
List Debtor Licensee Name
August, 2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,


Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

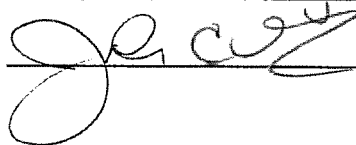
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 195TX, 202TX, 198TX & 203TX

LICENSEE NAME: Funny Monica In Chicago, Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 195TX, 202TX, 198TX & 203TX either individually or through a company that I own and I have a defense to
the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: Via Regular and Certified Mail

Galina Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Galina Garber-Shenin

1040 Lake Shore Dr., Apt. 7C

Chicago, IL 60611-1165

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 5213TX, 5097TX, 2278TX, 5747TX, 5743TX & 5946TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

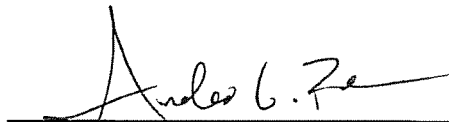
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Galina Cab Corp., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

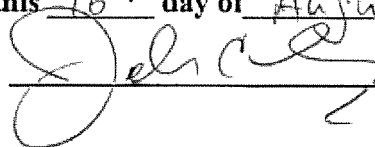
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 5213TX, 5097TX, 2278TX, 5747TX, 5743TX & 5946TX

LICENSEE NAME: Galina Cab Corp.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 5213TX, 5097TX, 2278TX, 5747TX, 5743TX & 5946TX either individually or through a company that I own
and I have a defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure
sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: Via Regular and Certified Mail

Gap Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Valentina Zubok

34 Waterview Ct.

Riverhead, NY 11901-6312

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 1561TX, 1650TX, 2793TX, 3615TX, 4933TX, 1716TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name

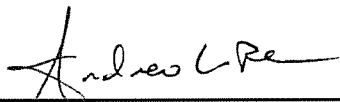
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee

Gap Cab Corp., by certified mail, return receipt requested on this 16th day of August, 2018.
List Debtor Licensee Name

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

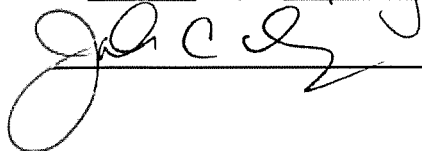
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 1561TX, 1650TX, 2793TX, 3615TX, 4933TX, 1716TX

LICENSEE NAME: Gap Cab Corp.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 1561TX, 1650TX, 2793TX, 3615TX, 4933TX, 1716TX either individually or through a company that I own

and I have a defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Green Tea Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Maya Zubok

110-11 Queens Blvd., Apt. 11-K

Forest Hills, NY 11375

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 4949TX, 4946TX, 4936TX, 4935TX, & 4923TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

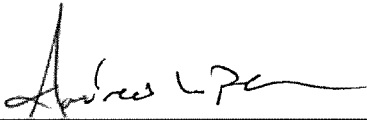
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Green Tea Cab Corp., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

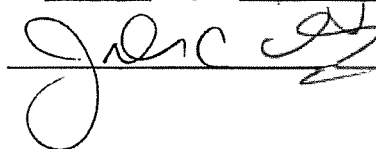
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 4949TX, 4946TX, 4936TX, 4935TX, & 4923TX

LICENSEE NAME: Green Tea Cab Corp.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 4949TX, 4946TX, 4936TX, 4935TX, & 4923TX either individually or through a company that I own and I

have a defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Jasmin Taxi Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Galina Garber-Shenin

1040 Lake Shore Dr., Apt. 7C

Chicago, IL 60611-1165

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 2966TX, 2965TX & 2963TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

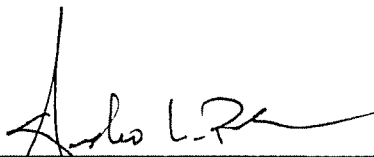
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN **FIFTEEN (15) DAYS** FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Jasmin Taxi Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

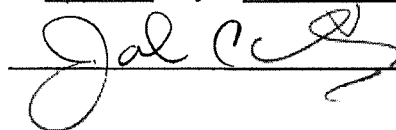
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of AUGUST, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 2966TX, 2965TX & 2963TX

LICENSEE NAME: Jasmin Taxi Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 2966TX, 2965TX & 2963TX either individually or through a company that I own and I have a defense to the
foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: Via Regular and Certified Mail

Jasmin Taxi Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Galina Garber-Shenin

1040 Lake Shore Dr., Apt. 7C

Chicago, IL 60611-1165

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 2969TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: Tedros Mebrahtu Sereke, for \$23,500 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name

Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee

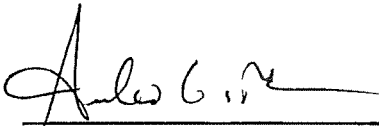
Jasmin Taxi Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name

2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP

Law Firm

875 Third Avenue, New York, NY 10022

Address

212-704-6000

Phone

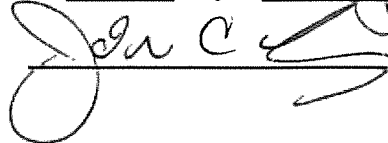
andrew.buck@troutman.com

Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 2969TX

LICENSEE NAME: Jasmin Taxi Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 2969TX either individually or through a company that I own and I have a defense to the foreclosure of these
licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: Via Regular and Certified Mail

June Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 2645TX, 2775TX, 3027TX, 3403TX, 4439TX & 5461TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name

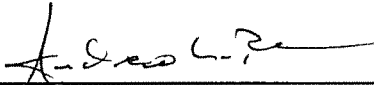
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee

June Cab Corp., by certified mail, return receipt requested on this 16th day of August, 2018.
List Debtor Licensee Name

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

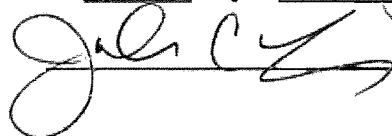
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 2018.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 2645TX, 2775TX, 3027TX, 3403TX, 4439TX & 5461TX

LICENSEE NAME: June Cab Corp.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 2645TX, 2775TX, 3027TX, 3403TX, 4439TX & 5461TX either individually or through a company that I own
and I have a defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure
sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Lucky Four Cab Corp.
2617 S. Wabash Avenue
Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber
101 Warren Street, Apt 3210 or 3240
New York, NY 10007-1366

Via Regular and Certified Mail

Chicago Elite Cab Corp.
2617 S. Wabash Avenue
Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 859TX, 884TX, 911TX & 995TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

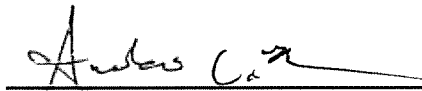
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Lucky Four Cab Corp., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP

Law Firm

875 Third Avenue, New York, NY 10022

Address

212-704-6000

Phone

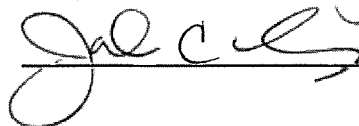
andrew.buck@troutman.com

Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 2018.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 859TX, 884TX, 911TX & 995TX

LICENSEE NAME: Lucky Four Cab Corp.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 859TX, 884TX, 911TX & 995TX either individually or through a company that I own and I have a defense to
the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Lucky In Chicago, Inc.
2617 S. Wabash Avenue
Chicago, IL 60616

Via Regular and Certified Mail

Valentina Zubok
34 Waterview Ct.
Riverhead, NY 11901-6312

Via Regular and Certified Mail

Chicago Elite Cab Corp.
2617 S. Wabash Avenue
Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 124TX, 139TX, 141TX, 175TX, 286TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

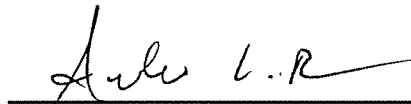
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Lucky In Chicago, Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP

Law Firm

875 Third Avenue, New York, NY 10022

Address

212-704-6000

Phone

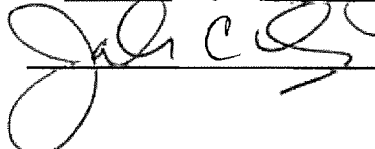
andrew.buck@troutman.com

Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 124TX, 139TX, 141TX, 175TX, 286TX

LICENSEE NAME: Lucky In Chicago, Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 124TX, 139TX, 141TX, 175TX, 286TX either individually or through a company that I own and I have a
defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: Via Regular and Certified Mail

Magenta Zone Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Galina Garber-Shenin

1040 Lake Shore Dr., Apt. 7C

Chicago, IL 60611-1165

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 4286TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: Luis Jara, for \$23,100 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

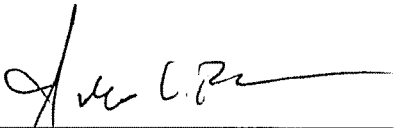
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Magenta Zone Cab Corp., by certified mail, return receipt requested on this 16th day of
List Debtor Licensee Name
August, 2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

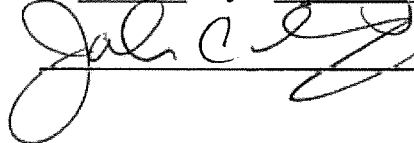
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 4286TX

LICENSEE NAME: Magenta Zone Cab Corp.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 4286TX either individually or through a company that I own and I have a defense to the foreclosure of these
licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Magenta Zone Cab Co.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Galina Garber-Shenin

1040 Lake Shore Dr., Apt. 7C

Chicago, IL 60611-1165

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 4071TX, 4121TX & 4137TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

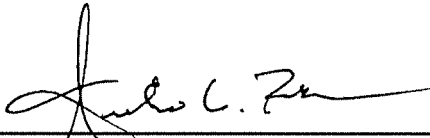
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Magenta Zone Cab Co., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

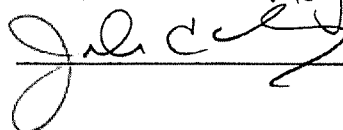
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346876
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 4071TX, 4121TX & 4137TX

LICENSEE NAME: Magenta Zone Cab Co.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 4071TX, 4121TX & 4137TX either individually or through a company that I own and I have a defense to the
foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Mauve Zone Cab Co.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Galina Garber-Shenin

1040 Lake Shore Dr., Apt. 7C

Chicago, IL 60611-1165

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 1945TX, 4364TX, 4463TX, 4475TX & 4528TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

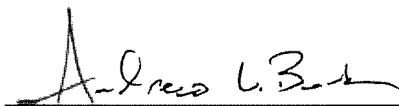
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Mauve Zone Cab Co., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP

Law Firm

875 Third Avenue, New York, NY 10022

Address

212-704-6000

Phone

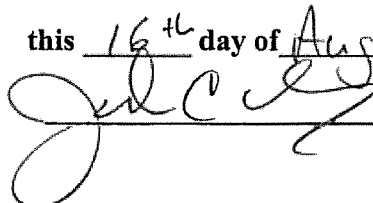
andrew.buck@troutman.com

Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 1945TX, 4364TX, 4463TX, 4475TX & 4528TX

LICENSEE NAME: Mauve Zone Cab Co.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 1945TX, 4364TX, 4463TX, 4475TX & 4528TX either individually or through a company that I own and I
have a defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: Via Regular and Certified Mail

Misha Cat Cab Corp.
2617 S. Wabash Avenue
Chicago, IL 60616

Via Regular and Certified Mail

Valentina Zubok
34 Waterview Ct.
Riverhead, NY 11901-6312

Via Regular and Certified Mail

Chicago Elite Cab Corp.
2617 S. Wabash Avenue
Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 4769TX, 4775TX, 4778TX, 4782TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

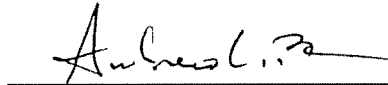
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Misha Cat Cab Corp., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

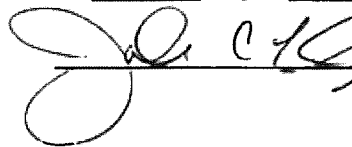
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 4769TX, 4775TX, 4778TX, 4782TX

LICENSEE NAME: Misha Cat Cab Corp.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 4769TX, 4775TX, 4778TX, 4782TX either individually or through a company that I own and I have a defense
to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: Via Regular and Certified Mail

Monaco Taxi, Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 4790TX, 4792TX, 4798TX, 4803TX & 4818TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

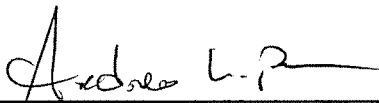
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Monaco Taxi, Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP

Law Firm

875 Third Avenue, New York, NY 10022

Address

212-704-6000

Phone

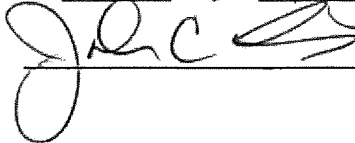
andrew.buck@troutman.com

Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 4790TX, 4792TX, 4798TX, 4803TX & 4818TX

LICENSEE NAME: Monaco Taxi, Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 4790TX, 4792TX, 4798TX, 4803TX & 4818TX either individually or through a company that I own and I
have a defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Moneta Taxi Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 1641TX, 2394TX & 2968TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

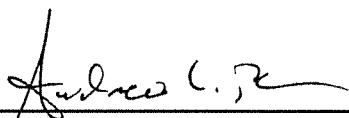
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Moneta Taxi Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

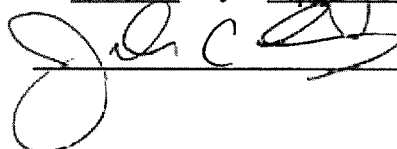
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified in Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 2018.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 1641TX, 2394TX & 2968TX

LICENSEE NAME: Moneta Taxi Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 1641TX, 2394TX & 2968TX either individually or through a company that I own and I have a defense to the
foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: Via Regular and Certified Mail

Moneta Taxi Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 3006TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: Sorin Moldovan, for \$23,100 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

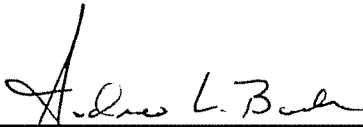
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Moneta Taxi Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

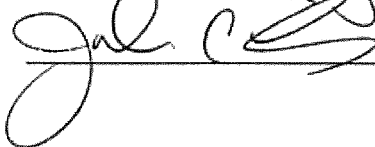
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 2018.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 3006TX

LICENSEE NAME: Moneta Taxi Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 3006TX either individually or through a company that I own and I have a defense to the foreclosure of these
licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Pink Zone Cab Co.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Galina Garber-Shenin

1040 Lake Shore Dr., Apt. 7C

Chicago, IL 60611-1165

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 3745TX, 3774TX, 3786TX & 3840TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name

Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee

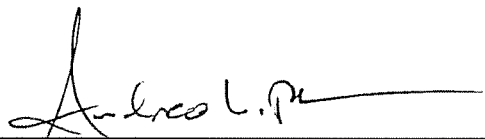
Pink Zone Cab Co., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name

2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP

Law Firm

875 Third Avenue, New York, NY 10022

Address

212-704-6000

Phone

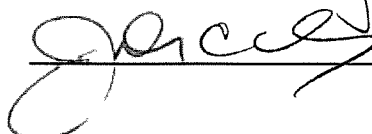
andrew.buck@troutman.com

Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 2018.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 3745TX, 3774TX, 3786TX & 3840TX

LICENSEE NAME: Pink Zone Cab Co.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 3745TX, 3774TX, 3786TX & 3840TX either individually or through a company that I own and I have a
defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Pretty Rachel In Chicago, Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Galina Garber-Shenin

1040 Lake Shore Dr., Apt. 7C

Chicago, IL 60611-1165

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 213TX, 216TX, 218TX & 221TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

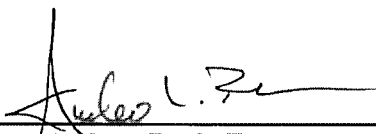
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Pretty Rachel In Chicago, Inc., by certified mail, return receipt requested on this 16th day of
List Debtor Licensee Name
August, 2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,


Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

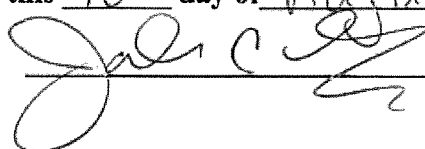
875 Third Avenue, New York, NY 10022
Address

212-704-6000
Phone

andrew.buck@troutman.com
Email Address

Subscribed and Sworn to before me

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

this 16th day of August, 2018.

Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 213TX, 216TX, 218TX & 221TX

LICENSEE NAME: Pretty Rachel In Chicago, Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 213TX, 216TX, 218TX & 221TX either individually or through a company that I own and I have a defense to
the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: Via Regular and Certified Mail

Princess Taxi Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 1207TX, 1189TX, 1174TX & 1169TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

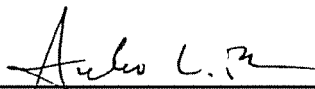
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Princess Taxi Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,


Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

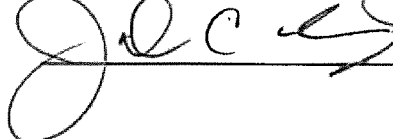
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 2018.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 1207TX, 1189TX, 1174TX & 1169TX

LICENSEE NAME: Princess Taxi Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 1207TX, 1189TX, 1174TX & 1169TX either individually or through a company that I own and I have a
defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: Via Regular and Certified Mail

Rachel Taxi Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Galina Garber-Shenin

1040 Lake Shore Dr., Apt. 7C

Chicago, IL 60611-1165

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 1291TX, 1273TX, 1262TX & 1230TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

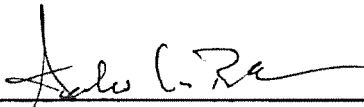
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN **FIFTEEN (15) DAYS** FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Rachel Taxi Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP

Law Firm

875 Third Avenue, New York, NY 10022

Address

212-704-6000

Phone

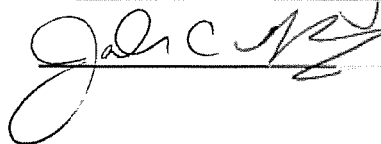
andrew.buck@troutman.com

Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 1291TX, 1273TX, 1262TX & 1230TX

LICENSEE NAME: Rachel Taxi Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 1291TX, 1273TX, 1262TX & 1230TX either individually or through a company that I own and I have a
defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: Via Regular and Certified Mail

Reservior II Hacking Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 1717TX, 1784TX, 1805TX, 1832TX & 1849TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

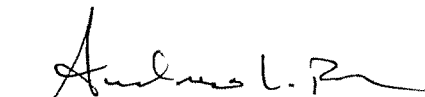
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Reservior II Hacking Corp., by certified mail, return receipt requested on this 16th day of
List Debtor Licensee Name
August, 2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP

Law Firm

875 Third Avenue, New York, NY 10022

Address

212-704-6000

Phone

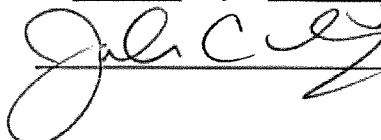
andrew.buck@troutman.com

Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified in Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 1717TX, 1784TX, 1805TX, 1832TX & 1849TX

LICENSEE NAME: Reservior II Hacking Corp.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 1717TX, 1784TX, 1805TX, 1832TX & 1849TX either individually or through a company that I own and I

have a defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Samuel Taxi Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 1866TX, 1867TX, 1870TX, 1910TX, 1938TX & 1951TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

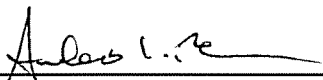
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Samuel Taxi Corp., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,


Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

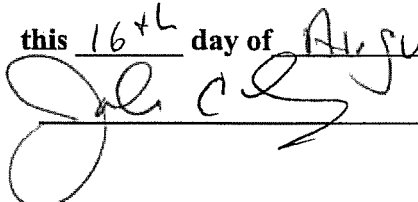
875 Third Avenue, New York, NY 10022
Address

212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.

Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 1866TX, 1867TX, 1870TX, 1910TX, 1938TX & 1951TX

LICENSEE NAME: Samuel Taxi Corp.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 1866TX, 1867TX, 1870TX, 1910TX, 1938TX & 1951TX either individually or through a company that I own

and I have a defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs

List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: Via Regular and Certified Mail

Shaun Jr. Taxi Inc.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 5956TX, 5955TX, 5953TX, 2871TX, 1075TX & 842TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

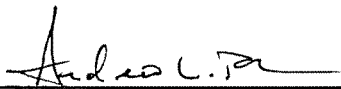
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Shaun Jr. Taxi Inc., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

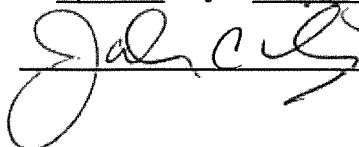
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 5956TX, 5955TX, 5953TX, 2871TX, 1075TX & 842TX

LICENSEE NAME: Shaun Jr. Taxi Inc.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 5956TX, 5955TX, 5953TX, 2871TX, 1075TX & 842TX either individually or through a company that I own

and I have a defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 5956TX, 5955TX, 5953TX, 2871TX, 1075TX & 842TX

LICENSEE NAME: Shaun Jr. Taxi Inc.

I, Simon CARBER, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 5956TX, 5955TX, 5953TX, 2871TX, 1075TX & 842TX either individually or through a company that I own
and I have a defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure
sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed)

see attached Defense Document

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Sheimin Edward

VP and authorized signature agent

2617 S. Wabash Ave Chicago IL 60616

312 781-1255

edward5@chicagocarriagecab.com

Subscribed and Sworn to before me

this 22 day of Aug, 2018.



JANET DAVIS
Notary Public - State of Illinois
My Commission Expires Sep 2019

Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

DEFENSE DOCUMENT

In support of its Affidavit of Defense to Creditor, Licensee asserts the following defenses in opposition to the Creditor's ("Creditor" or "Capital One") request to transfer public passenger vehicle license upon foreclosure and to the foreclosure sale: (1) Capital One has no right to foreclose on the medallions at issue; (2) Licensee does not owe the amount claimed by Capital One and has not defaulted on the agreement at issue with Capital One; (3) the foreclosure resulted in an improper foreclosure sale purchase that violated the BACP Taxi Rules; (4) Capital One instituted an improper foreclosure sale process; (5) Capital One breached its fiduciary duty to Licensee; (6) Capital One breached the implied covenant of good faith and fair dealing; (7) Capital One's claim of breach of contract / default is barred by the doctrines of estoppel, waiver, ratification and/or acquiescence. Because Licensee has timely submitted a completed Affidavit of Defense, pursuant to the BACP Taxi Rules, no transfer upon foreclosure may be allowed except pursuant to an order of a court having jurisdiction. Therefore, Licensee respectfully requests that the BACP deny Creditor's Request to Transfer Taxicab Medallion License Upon Foreclosure.

FACTUAL BACKGROUND

1. Symon Garber formed Tri Global Financial Services, Inc. ("Tri Global") in 2004, along with Roman Sapino and others, to provide capital to taxicab medallion owners. Tri Global's principal, Roman Sapino, also has many years of experience in the taxicab financing industry and has been involved in successful taxicab enterprises in New York and Chicago. Tri Global's co-owners include Galina Garber-Sheinin and Valentina Zubok. Irene Gans and Maya Zubok are related to an owner of Tri Global.

2. Tri Global is a corporation formed and existing under the laws of the State of

Illinois, maintaining offices at 2617 S. Wabash Avenue, Chicago, Illinois 60616. Tri Global is engaged in the business of financing and servicing Chicago-based taxi medallion loans as well as offering second-position financing to the taxi industry.

3. Upon information and belief, Capital One is a corporation formed and existing under the laws of the State of New York, maintaining a principal place of business at 265 Broadhollow Road, Melville, New York 11747.

4. Tri Global was formed to provide loans to purchasers of public passenger vehicle licenses and medallions in the Chicago market, which confers the right to operate a taxicab in Chicago pursuant to the regulations issued and regulated by the City of Chicago Department of Business Affairs and Consumer Protection (“BACP”).

5. Tri Global offered medallion and other financing to a wide-variety of borrowers, including taxicab businesses that rely on the medallion-secured loans to earn their livelihoods. Tri Global primarily focused its business on servicing taxi medallion loans for various lenders and also offered second-position financing to the taxi industry. In or around 2006 Tri Global was approached by North Fork Bank, which expressed interest in partnering with Tri Global to expand the scope of its lending platform.

6. Over the next several years, Tri Global and North Fork Bank entered into numerous successful loan participations. When North Fork Bank was acquired by Capital One in or about 2006/2007, this practice continued with Capital One.

7. Capital One was even more eager than North Fork Bank to capitalize upon Tri Global’s contacts in the Chicago marketplace and strongly encouraged Tri Global to aggressively seek prospects for additional medallion loans. Capital One and Tri Global participated in the loans on a loan-by-loan basis for several years.

8. In 2010, Capital One requested that Tri Global enter into a more formal arrangement by way of a master participation agreement, to which Tri Global agreed. The terms and conditions governing that relationship and Capital One's senior participation interests in the loans are more particularly set forth in a certain Master Joint Participation Agreement, dated August 2, 2010 (the "MJPA" or the "Tri Global MJPA").

9. In connection with the Tri Global MJPA, Symon Garber, Roman Sapino, Ruben Giacomozzi, Valentina Zubok, and Galina Garber-Sheinin signed the Tri Global Guaranty, dated August 2, 2010.

10. Pursuant to the terms of the MJPA, Tri Global generated business, handled collections, serviced the loans and remitted monthly payments to Capital One in accordance with the amount of its participation in each underlying loan while Capital One held senior participation interests in the various loans made and serviced by Tri Global to owners of Chicago taxicab medallions (the "Loans"). The Tri Global MJPA contemplates the sale of senior participation interests in loans issued and/or originated by Tri Global to owners and operators of taxi medallions. As reflected in the Tri Global MJPA, after Tri Global sells a participation interest, it continues to service the debt owed thereunder. In exchange for its services, Tri Global receives a servicing fee that is paid from the debt-service payments remitted to Tri Global each month.

11. Since the inception of the Tri Global/Capital One relationship, the parties have participated in many loans. Although Tri Global originated the medallion-secured loans and served as the official loan servicer for the loan portfolio, Tri Global relied on and trusted Capital One and its commercial finance expertise. This relationship was often characterized by Capital One as a "team" and "partnership" and its officers and representatives, including David Cin ("Cin") and others, regularly commented that the success of the portfolio was the product of a "team effort."

12. Although Capital One historically had no real presence in the Chicago medallion market, Capital One was eager to exploit Tri Global's connections to the taxicab medallion market and capitalize upon Tri Global's market dominance in the Chicago taxi-medallion economy. Capital One strongly encouraged Tri Global to aggressively acquire additional Chicago-based medallion loans.

13. As the value of Chicago taxi medallion loans continued to rise, Capital One continued to aggressively press Tri Global to originate new loans so that Capital One could further capitalize on its market position and emerge as a leading taxi medallion lender in Chicago.

14. Throughout the course of the Master Joint Participation Agreement, Tri Global, Symon Garber, Valentina Zubok, and Galina Garber-Sheinin – whose interests were closely aligned with those of Capital One – worked with Capital One to maximize the return on the medallion loans.

15. Tri Global originated the agreement/loan at issue between Licensee and Capital One based on Tri Global's relationship with Capital One.

16. Despite its long-standing business venture with Tri Global, Capital One engaged in intentional and systematic efforts to line its own pockets to the detriment of Licensee, Tri Global, Symon Garber, Valentina Zubok, and Galina Garber-Sheinin. As explained below, Capital One engaged in irreconcilable conflicts of interest, bad faith business practices, and intentionally disregarded its duty of good faith to Licensee and Tri Global when it partnered with a major taxi-industry competitor, Uber Technologies, Inc. ("Uber").

17. In or about late 2013 and early 2014, and unbeknownst to Licensee and Tri Global (and many other Capital One loan participants and medallion-secured borrowers), Capital One began secretly planning to change course and exit the medallion market to partner with the

industry's most ominous competitor, Uber. Notwithstanding this new partnership, Capital One, either intentionally or recklessly, continued to encourage Tri Global to cultivate new medallion-secured loans while concealing its intention to partner with Uber.

18. News of Capital One's partnership with Uber surfaced in approximately mid-2014, and was followed by an aggressive nationwide marketing campaign launched by Capital One. The marketing campaign and promotions touted Capital One's "unique new partnership" with Uber and underscored the "common focus" of both companies.

19. Capital One began offering significant incentives to its consumers to choose Uber vehicles over properly licensed and regulated taxis – including offering free and discounted Uber rides and other similar promotions such as a 20% discount on all Uber rides when paid with a Capital One "Quicksilver" credit card. Capital One offered new customers two free Uber rides worth up to \$60.00. Capital One created a new website promoting these incentives and further signaling its collaboration with Uber: "capitalone.com/uber".

20. Capital One's partnership with Uber came as a great shock to Licensee, Tri Global, Symon Garber, Valentina Zubok, and Galina Garber-Sheinin as the partnership was never disclosed to them prior to the 2014 marketing blitz. At no point in the parties' relationship was it ever contemplated that Capital One would undertake any action to undermine the taxi industry, the agreement at issue, or the value of Tri Global's and Capital One's loan portfolio.

21. In partnering with and promoting Uber's ride-share services, Capital One and Uber's assault on the taxi industry has been instrumental in bringing about the destabilization of the Chicago taxi medallion market.

22. In 2014, when Capital One began its partnership with Uber, the Chicago market softened dramatically. Sometime during mid-2014, funding to the medallion industry came to a

total halt. This was clearly tied to Capital One's partnership with Uber.

23. By 2015, Uber reported that taxi usage nationwide had precipitously decreased while the number of customers using Uber increased correspondingly.

24. The disruption of the taxi industry resulting from Capital One's partnership with Uber contributed to the reduction in value of the Chicago taxi medallions securing the loans.

25. In short, Capital One has caused the price of the Chicago taxi medallions that secure the loans to plummet.

26. Moreover, Capital One has sabotaged Tri Global, Symon Garber, Valentina Zubok, Galina Garber-Sheinin and Licensee's efforts to favorably restructure and/or modify the medallion-secured loans at issue.

27. Accordingly, Capital One has materially breached the credit agreement and Licensee is not liable for the amount allegedly owed pursuant to the credit agreement.

FIRST DEFENSE
(No Right to Foreclose)

28. Licensee repeats, realleges and incorporates each of the preceding allegations as if set forth at length herein.

29. Capital One, through its partnership with Uber, precipitated the collapse of the Chicago taxi medallion industry and the medallion industry nationwide, in addition to the corresponding decline in the value of the taxi medallions at issue.

30. Based on Capital One's willful misconduct, breach of contract, malfeasance, wrongdoing and/or other intentional and/or reckless conduct, Capital One has no right to foreclose on the medallions at issue.

SECOND DEFENSE
(No Default by Licensee)

31. Licensee repeats, realleges and incorporates each of the preceding allegations as if set forth at length herein.

32. Licensee does not owe the amount claimed by Capital One and has not defaulted on the agreement at issue with Capital One.

33. Therefore, Capital One has no right to foreclose on the medallions at issue.

THIRD DEFENSE
(Improper Foreclosure Sale Purchase)

34. Licensee repeats, realleges and incorporates each of the preceding allegations as if set forth at length herein.

35. On August 9, 2018, to start the foreclosure, Capital One opened the auction with an initial credit bid of \$23,000.00.

36. Capital One won the foreclosure auction with its initial \$23,000.00 credit bid.

37. Pursuant to Rule TX13.03(b), “[t]he [foreclosure] purchaser must meet all the criteria for licensing as set out in the Municipal Code of Chicago and [the BACP’s] rules and regulations, including payment of the license transfer fee, license fees and any other fees, fines or taxes due and owing to the City.” Rule TX13.03(b).

38. Pursuant to Rule TX13.04(d), “[t]he taxicab medallion license must be sold to a person believed to be a qualified applicant . . .” Rule TX13.04(d); *see also* TX13.06(a).

39. Upon information and belief, Capital One is not a qualified applicant and has no intention of ever seeking licensure under the Municipal Code of Chicago or BACP Taxi Rules.

40. The purpose behind the BACP Taxi Rules’ foreclosure process is to facilitate keeping medallions operating on the street. If Capital One is allowed to purchase the medallions,

with no intention of ever becoming licensed by the BACP, Capital One would be allowed to cause further harm to the taxicab industry and further benefit Uber.

41. Therefore, the foreclosure sale did not comply with Rules TX13.03 and TX13.04 and the foreclosure auction resulted in an improper sale/purchase that violated the BACP Taxi Rules.

42. Moreover, Capital One's intent behind the foreclosure sale is to destroy and cause further harm to Licensee, Tri Global, and Tri Global's owners and guarantors. Capital One has filed multiple actions against Licensee, Tri Global, and/or Tri Global's owners and guarantors and instead of allowing any of these cases to reach their natural conclusion, Capital One instead seeks to implement destructive tactics by foreclosing on the medallions in order to further destroy the medallion market by setting the prices and discouraging bids, all in violation of the Taxi Rules simply to inflict maximum damage and cause irreparable harm. In a recent case that was filed in the Circuit Court of Cook County, *Capital One Equipment Finance Corp. v. Chicago Elite Cab Corp., et al.*, No. 17 L 998, the Honorable Margaret A. Brennan dismissed Capital One's complaint but allowed Capital One leave to re-file its cause of action in another case currently pending in New York. That New York Action is *Capital One Equipment Finance Corp. v. The OSG Corp., Tri Global Financial Services, Inc. et al.*, No. 600749/2017. But, rather than re-file its case in the New York Action and pursue its alleged causes of action, Capital One instead chose to do an end run around the litigation process and seeks to foreclose on the medallions at issue in an attempt to destroy Licensee, Tri Global and Tri Global's owners and guarantors. Capital One did not re-file its Chicago cause of action in the New York Action because it knows that counterclaims would be filed against it, which would expose Capital One's bad faith conduct in abusing its partnership with Tri Global and expose Capital One's bad faith relationship with Uber. The reality is that

Capital One has filed numerous unsuccessful complaints in courts in New York and Chicago and, because these lawsuits have not been successful, Capital One is now attempting to cause as much harm as possible to Licensee and Tri Global before the counterclaims against Capital One are proven true and Capital One's bad faith is exposed.

FOURTH DEFENSE
(Improper Foreclosure Sale Process)

43. Licensee repeats, realleges and incorporates each of the preceding allegations as if set forth at length herein.

44. On August 9, 2018, to start the foreclosure, Capital One opened the auction with an initial credit bid of \$23,000.00.

45. During the beginning part of the foreclosure auction, it became clear that no individuals were going to bid on the medallions because a foreclosure purchaser would have been liable for any and all liens on the medallions and such liability was unknown at the time of the auction. Capital One then stopped the foreclosure auction and announced to the individuals attending the auction that Capital One would work with any potential foreclosure purchasers and the bank to work out a deal on any liens on the medallion(s) bought at the auction. Capital One further stated that if the foreclosure purchaser and the bank could not work out an agreement concerning any liens on the medallions bought at the auction, Capital One would refund the foreclosure purchaser's money as if the foreclosure sale never took place. After this announcement, Capital One resumed the auction.

46. By instituting this type of foreclosure auction, Capital One created an improper foreclosure process that created false values and did not bind the foreclosure purchasers.

FIFTH DEFENSE
(Breach of Fiduciary Duty)

47. Licensee repeats, realleges and incorporates each of the preceding allegations as if set forth at length herein.

48. As set forth above, Licensee, Tri Global, Symon Garber, Valentina Zubok, and Galina Garber-Sheinin relied heavily on and trusted Capital One.

49. By virtue of the parties' business relationship as set forth above, and by reason of the demonstrable level of trust and confidence upon which Licensee, Tri Global, Symon Garber, Valentina Zubok, and Galina Garber-Sheinin depended and which Capital One knowingly accepted, Capital One owes certain fiduciary duties to Licensee, Tri Global, Symon Garber, Valentina Zubok, and Galina Garber-Sheinin including, without limitation, a duty of good faith.

50. As explained herein, for years Tri Global relied on Capital One to guide certain aspects of its taxi-medallion loan origination and servicing business. Although the Tri Global MJPA provided discretion to Capital One, that discretion did not include a right to abandon the lending market or purposely advance competing interests to destabilize the industry upon which the very loans that were being serviced were based.

51. Ultimately, Capital One repudiated its commitments to Licensee and abandoned the Chicago medallion lending market so that it could pursue a competing venture with Uber.

52. Capital One breached its duty of good faith, and the trust and confidence of Licensee by, among other things: precipitating, through its partnership with Uber, the collapse of the Chicago taxi medallion industry and the medallion industry nationwide, in addition to the corresponding decline in the value of the taxi medallions at issue.

53. Capital One engaged in an intentional course of wrongful conduct orchestrated to harm Licensee.

54. Capital One's conduct was willful, wanton and in reckless disregard of the Licensee's contractual rights and was otherwise wrongful.

55. As a direct and proximate result of Capital One's breach of its fiduciary duties, Licensee has suffered, and will continue to suffer, substantial damages.

SIXTH DEFENSE
(Breach of the Implied Covenant of Good Faith and Fair Dealing)

56. Licensee repeats, realleges and incorporates each of the preceding allegations as if set forth at length herein.

57. Pursuant to the covenant of good faith and fair dealing, Capital One could not undertake any action that has the effect of destroying or injuring the right of the other party to receive the fruits of the contract.

58. As explained herein, Capital One breached the duty of good faith and fair dealing implied in the contract with Licensee by, among other things: precipitating, through its partnership with Uber, the collapse of the taxi medallion industry and concomitant decline in the value of the taxi medallions at issue.

59. As a direct and proximate result of Capital One's breach of the implied covenant of good faith and fair dealing thereunder, Licensee has suffered, and will continue to suffer, substantial damages.

SEVENTH DEFENSE
(Estoppel, Waiver, Ratification and/or Acquiescence)

60. Licensee repeats, realleges and incorporates each of the preceding allegations as if set forth at length herein.

61. Capital One's claim of breach of contract / default is barred by the doctrines of estoppel, waiver, ratification and/or acquiescence.

CONCLUSION

WHEREFORE, based upon the foregoing allegations and defenses and all reasons appearing of record, Licensee has timely submitted a completed Affidavit of Defense and, pursuant to the BACP Taxi Rules, no transfer upon foreclosure may be allowed except pursuant to an order of a court having jurisdiction. Licensee respectfully requests that the BACP deny Creditor's Request to Transfer Taxicab Medallion License Upon Foreclosure.

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: Via Regular and Certified Mail

Siro, Inc.
2617 S. Wabash Avenue
Chicago, IL 60616

Via Regular and Certified Mail

Chicago Elite Cab Corp.
2617 S. Wabash Avenue
Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber
101 Warren Street, Apt 3210 or 3240
New York, NY 10007-1366

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 4764TX, 4114TX, 6318TX, 2273TX, 1793TX, 1491TX, 1275TX, 1164TX, 915TX, 6230TX, 6122TX & 5625TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

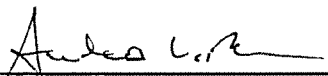
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Siro, Inc., by certified mail, return receipt requested on this 16th day of August, 2018.
List Debtor Licensee Name

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,


Name: Andrew Buck, Esq.

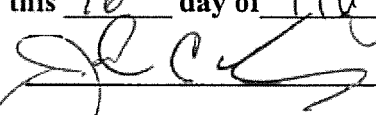
Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me
this 16th day of August, 2018.

Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 4764TX, 4114TX, 6318TX, 2273TX, 1793TX, 1491TX, 1275TX, 1164TX, 915TX, 6230TX, 6122TX & 5625TX

LICENSEE NAME: Siro, Inc.

I, _____ Debtor Individual Name _____, hereby swear that I own Taxicab Medallion License
Number(s) 4764TX, 4114TX, 6318TX, 2273TX, 1793TX, 1491TX, 1275TX, 1164TX, 915TX, 6230TX, 6122TX & 5625TX either individually or through a company that I own and I have a defense to the foreclosure of these licenses. I
understand that this license(s) was sold at a foreclosure sale on or about August 9, 2018 and that sale is
contingent upon approval by the Department of Business Affairs and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

SLS Jet Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Symon Garber

101 Warren Street, Apt 3210 or 3240

New York, NY 10007-1366

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 3421TX, 4029TX, 4537TX, 4656TX, 4705TX & 2276TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

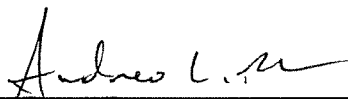
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
SLS Jet Cab Corp., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP

Law Firm

875 Third Avenue, New York, NY 10022

Address

212-704-6000

Phone

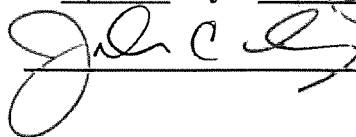
andrew.buck@troutman.com

Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 3421TX, 4029TX, 4537TX, 4656TX, 4705TX & 2276TX

LICENSEE NAME: SLS Jet Cab Corp.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 3421TX, 4029TX, 4537TX, 4656TX, 4705TX & 2276TX either individually or through a company that I own

and I have a defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 3421TX, 4029TX, 4537TX, 4656TX, 4705TX & 2276TX

LICENSEE NAME: SLS Jet Cab Corp.

I, Symon Carter, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 3421TX, 4029TX, 4537TX, 4656TX, 4705TX & 2276TX either individually or through a company that I own
and I have a defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure
sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed)

see attached Defense Document

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Sherwin Edward

VP and authorized signature agent

2617 S. Wabash Ave Chicago IL 60616

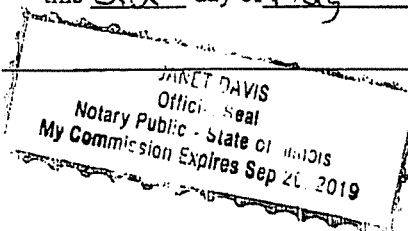
312 791-1255

edwards@chicagocarriagecab.com

Subscribed and Sworn to before me

this 22 day of Aug, 2018.





Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

DEFENSE DOCUMENT

In support of its Affidavit of Defense to Creditor, Licensee asserts the following defenses in opposition to the Creditor's ("Creditor" or "Capital One") request to transfer public passenger vehicle license upon foreclosure and to the foreclosure sale: (1) Capital One has no right to foreclose on the medallions at issue; (2) Licensee does not owe the amount claimed by Capital One and has not defaulted on the agreement at issue with Capital One; (3) the foreclosure resulted in an improper foreclosure sale purchase that violated the BACP Taxi Rules; (4) Capital One instituted an improper foreclosure sale process; (5) Capital One breached its fiduciary duty to Licensee; (6) Capital One breached the implied covenant of good faith and fair dealing; (7) Capital One's claim of breach of contract / default is barred by the doctrines of estoppel, waiver, ratification and/or acquiescence. Because Licensee has timely submitted a completed Affidavit of Defense, pursuant to the BACP Taxi Rules, no transfer upon foreclosure may be allowed except pursuant to an order of a court having jurisdiction. Therefore, Licensee respectfully requests that the BACP deny Creditor's Request to Transfer Taxicab Medallion License Upon Foreclosure.

FACTUAL BACKGROUND

1. Symon Garber formed Tri Global Financial Services, Inc. ("Tri Global") in 2004, along with Roman Sapino and others, to provide capital to taxicab medallion owners. Tri Global's principal, Roman Sapino, also has many years of experience in the taxicab financing industry and has been involved in successful taxicab enterprises in New York and Chicago. Tri Global's co-owners include Galina Garber-Sheinin and Valentina Zubok. Irene Gans and Maya Zubok are related to an owner of Tri Global.

2. Tri Global is a corporation formed and existing under the laws of the State of

Illinois, maintaining offices at 2617 S. Wabash Avenue, Chicago, Illinois 60616. Tri Global is engaged in the business of financing and servicing Chicago-based taxi medallion loans as well as offering second-position financing to the taxi industry.

3. Upon information and belief, Capital One is a corporation formed and existing under the laws of the State of New York, maintaining a principal place of business at 265 Broadhollow Road, Melville, New York 11747.

4. Tri Global was formed to provide loans to purchasers of public passenger vehicle licenses and medallions in the Chicago market, which confers the right to operate a taxicab in Chicago pursuant to the regulations issued and regulated by the City of Chicago Department of Business Affairs and Consumer Protection (“BACP”).

5. Tri Global offered medallion and other financing to a wide-variety of borrowers, including taxicab businesses that rely on the medallion-secured loans to earn their livelihoods. Tri Global primarily focused its business on servicing taxi medallion loans for various lenders and also offered second-position financing to the taxi industry. In or around 2006 Tri Global was approached by North Fork Bank, which expressed interest in partnering with Tri Global to expand the scope of its lending platform.

6. Over the next several years, Tri Global and North Fork Bank entered into numerous successful loan participations. When North Fork Bank was acquired by Capital One in or about 2006/2007, this practice continued with Capital One.

7. Capital One was even more eager than North Fork Bank to capitalize upon Tri Global’s contacts in the Chicago marketplace and strongly encouraged Tri Global to aggressively seek prospects for additional medallion loans. Capital One and Tri Global participated in the loans on a loan-by-loan basis for several years.

8. In 2010, Capital One requested that Tri Global enter into a more formal arrangement by way of a master participation agreement, to which Tri Global agreed. The terms and conditions governing that relationship and Capital One's senior participation interests in the loans are more particularly set forth in a certain Master Joint Participation Agreement, dated August 2, 2010 (the "MJPA" or the "Tri Global MJPA").

9. In connection with the Tri Global MJPA, Symon Garber, Roman Sapino, Ruben Giacomozzi, Valentina Zubok, and Galina Garber-Sheinin signed the Tri Global Guaranty, dated August 2, 2010.

10. Pursuant to the terms of the MJPA, Tri Global generated business, handled collections, serviced the loans and remitted monthly payments to Capital One in accordance with the amount of its participation in each underlying loan while Capital One held senior participation interests in the various loans made and serviced by Tri Global to owners of Chicago taxicab medallions (the "Loans"). The Tri Global MJPA contemplates the sale of senior participation interests in loans issued and/or originated by Tri Global to owners and operators of taxi medallions. As reflected in the Tri Global MJPA, after Tri Global sells a participation interest, it continues to service the debt owed thereunder. In exchange for its services, Tri Global receives a servicing fee that is paid from the debt-service payments remitted to Tri Global each month.

11. Since the inception of the Tri Global/Capital One relationship, the parties have participated in many loans. Although Tri Global originated the medallion-secured loans and served as the official loan servicer for the loan portfolio, Tri Global relied on and trusted Capital One and its commercial finance expertise. This relationship was often characterized by Capital One as a "team" and "partnership" and its officers and representatives, including David Cin ("Cin") and others, regularly commented that the success of the portfolio was the product of a "team effort."

12. Although Capital One historically had no real presence in the Chicago medallion market, Capital One was eager to exploit Tri Global's connections to the taxicab medallion market and capitalize upon Tri Global's market dominance in the Chicago taxi-medallion economy. Capital One strongly encouraged Tri Global to aggressively acquire additional Chicago-based medallion loans.

13. As the value of Chicago taxi medallion loans continued to rise, Capital One continued to aggressively press Tri Global to originate new loans so that Capital One could further capitalize on its market position and emerge as a leading taxi medallion lender in Chicago.

14. Throughout the course of the Master Joint Participation Agreement, Tri Global, Symon Garber, Valentina Zubok, and Galina Garber-Sheinin – whose interests were closely aligned with those of Capital One – worked with Capital One to maximize the return on the medallion loans.

15. Tri Global originated the agreement/loan at issue between Licensee and Capital One based on Tri Global's relationship with Capital One.

16. Despite its long-standing business venture with Tri Global, Capital One engaged in intentional and systematic efforts to line its own pockets to the detriment of Licensee, Tri Global, Symon Garber, Valentina Zubok, and Galina Garber-Sheinin. As explained below, Capital One engaged in irreconcilable conflicts of interest, bad faith business practices, and intentionally disregarded its duty of good faith to Licensee and Tri Global when it partnered with a major taxi-industry competitor, Uber Technologies, Inc. ("Uber").

17. In or about late 2013 and early 2014, and unbeknownst to Licensee and Tri Global (and many other Capital One loan participants and medallion-secured borrowers), Capital One began secretly planning to change course and exit the medallion market to partner with the

industry's most ominous competitor, Uber. Notwithstanding this new partnership, Capital One, either intentionally or recklessly, continued to encourage Tri Global to cultivate new medallion-secured loans while concealing its intention to partner with Uber.

18. News of Capital One's partnership with Uber surfaced in approximately mid-2014, and was followed by an aggressive nationwide marketing campaign launched by Capital One. The marketing campaign and promotions touted Capital One's "unique new partnership" with Uber and underscored the "common focus" of both companies.

19. Capital One began offering significant incentives to its consumers to choose Uber vehicles over properly licensed and regulated taxis – including offering free and discounted Uber rides and other similar promotions such as a 20% discount on all Uber rides when paid with a Capital One "Quicksilver" credit card. Capital One offered new customers two free Uber rides worth up to \$60.00. Capital One created a new website promoting these incentives and further signaling its collaboration with Uber: "capitalone.com/uber".

20. Capital One's partnership with Uber came as a great shock to Licensee, Tri Global, Symon Garber, Valentina Zubok, and Galina Garber-Sheinin as the partnership was never disclosed to them prior to the 2014 marketing blitz. At no point in the parties' relationship was it ever contemplated that Capital One would undertake any action to undermine the taxi industry, the agreement at issue, or the value of Tri Global's and Capital One's loan portfolio.

21. In partnering with and promoting Uber's ride-share services, Capital One and Uber's assault on the taxi industry has been instrumental in bringing about the destabilization of the Chicago taxi medallion market.

22. In 2014, when Capital One began its partnership with Uber, the Chicago market softened dramatically. Sometime during mid-2014, funding to the medallion industry came to a

total halt. This was clearly tied to Capital One's partnership with Uber.

23. By 2015, Uber reported that taxi usage nationwide had precipitously decreased while the number of customers using Uber increased correspondingly.

24. The disruption of the taxi industry resulting from Capital One's partnership with Uber contributed to the reduction in value of the Chicago taxi medallions securing the loans.

25. In short, Capital One has caused the price of the Chicago taxi medallions that secure the loans to plummet.

26. Moreover, Capital One has sabotaged Tri Global, Symon Garber, Valentina Zubok, Galina Garber-Sheinin and Licensee's efforts to favorably restructure and/or modify the medallion-secured loans at issue.

27. Accordingly, Capital One has materially breached the credit agreement and Licensee is not liable for the amount allegedly owed pursuant to the credit agreement.

FIRST DEFENSE
(No Right to Foreclose)

28. Licensee repeats, realleges and incorporates each of the preceding allegations as if set forth at length herein.

29. Capital One, through its partnership with Uber, precipitated the collapse of the Chicago taxi medallion industry and the medallion industry nationwide, in addition to the corresponding decline in the value of the taxi medallions at issue.

30. Based on Capital One's willful misconduct, breach of contract, malfeasance, wrongdoing and/or other intentional and/or reckless conduct, Capital One has no right to foreclose on the medallions at issue.

SECOND DEFENSE
(No Default by Licensee)

31. Licensee repeats, realleges and incorporates each of the preceding allegations as if set forth at length herein.

32. Licensee does not owe the amount claimed by Capital One and has not defaulted on the agreement at issue with Capital One.

33. Therefore, Capital One has no right to foreclose on the medallions at issue.

THIRD DEFENSE
(Improper Foreclosure Sale Purchase)

34. Licensee repeats, realleges and incorporates each of the preceding allegations as if set forth at length herein.

35. On August 9, 2018, to start the foreclosure, Capital One opened the auction with an initial credit bid of \$23,000.00.

36. Capital One won the foreclosure auction with its initial \$23,000.00 credit bid.

37. Pursuant to Rule TX13.03(b), “[t]he [foreclosure] purchaser must meet all the criteria for licensing as set out in the Municipal Code of Chicago and [the BACP’s] rules and regulations, including payment of the license transfer fee, license fees and any other fees, fines or taxes due and owing to the City.” Rule TX13.03(b).

38. Pursuant to Rule TX13.04(d), “[t]he taxicab medallion license must be sold to a person believed to be a qualified applicant . . .” Rule TX13.04(d); *see also* TX13.06(a).

39. Upon information and belief, Capital One is not a qualified applicant and has no intention of ever seeking licensure under the Municipal Code of Chicago or BACP Taxi Rules.

40. The purpose behind the BACP Taxi Rules’ foreclosure process is to facilitate keeping medallions operating on the street. If Capital One is allowed to purchase the medallions,

with no intention of ever becoming licensed by the BACP, Capital One would be allowed to cause further harm to the taxicab industry and further benefit Uber.

41. Therefore, the foreclosure sale did not comply with Rules TX13.03 and TX13.04 and the foreclosure auction resulted in an improper sale/purchase that violated the BACP Taxi Rules.

42. Moreover, Capital One's intent behind the foreclosure sale is to destroy and cause further harm to Licensee, Tri Global, and Tri Global's owners and guarantors. Capital One has filed multiple actions against Licensee, Tri Global, and/or Tri Global's owners and guarantors and instead of allowing any of these cases to reach their natural conclusion, Capital One instead seeks to implement destructive tactics by foreclosing on the medallions in order to further destroy the medallion market by setting the prices and discouraging bids, all in violation of the Taxi Rules simply to inflict maximum damage and cause irreparable harm. In a recent case that was filed in the Circuit Court of Cook County, *Capital One Equipment Finance Corp. v. Chicago Elite Cab Corp., et al.*, No. 17 L 998, the Honorable Margaret A. Brennan dismissed Capital One's complaint but allowed Capital One leave to re-file its cause of action in another case currently pending in New York. That New York Action is *Capital One Equipment Finance Corp. v. The OSG Corp., Tri Global Financial Services, Inc. et al.*, No. 600749/2017. But, rather than re-file its case in the New York Action and pursue its alleged causes of action, Capital One instead chose to do an end run around the litigation process and seeks to foreclose on the medallions at issue in an attempt to destroy Licensee, Tri Global and Tri Global's owners and guarantors. Capital One did not re-file its Chicago cause of action in the New York Action because it knows that counterclaims would be filed against it, which would expose Capital One's bad faith conduct in abusing its partnership with Tri Global and expose Capital One's bad faith relationship with Uber. The reality is that

Capital One has filed numerous unsuccessful complaints in courts in New York and Chicago and, because these lawsuits have not been successful, Capital One is now attempting to cause as much harm as possible to Licensee and Tri Global before the counterclaims against Capital One are proven true and Capital One's bad faith is exposed.

FOURTH DEFENSE
(Improper Foreclosure Sale Process)

43. Licensee repeats, realleges and incorporates each of the preceding allegations as if set forth at length herein.

44. On August 9, 2018, to start the foreclosure, Capital One opened the auction with an initial credit bid of \$23,000.00.

45. During the beginning part of the foreclosure auction, it became clear that no individuals were going to bid on the medallions because a foreclosure purchaser would have been liable for any and all liens on the medallions and such liability was unknown at the time of the auction. Capital One then stopped the foreclosure auction and announced to the individuals attending the auction that Capital One would work with any potential foreclosure purchasers and the bank to work out a deal on any liens on the medallion(s) bought at the auction. Capital One further stated that if the foreclosure purchaser and the bank could not work out an agreement concerning any liens on the medallions bought at the auction, Capital One would refund the foreclosure purchaser's money as if the foreclosure sale never took place. After this announcement, Capital One resumed the auction.

46. By instituting this type of foreclosure auction, Capital One created an improper foreclosure process that created false values and did not bind the foreclosure purchasers.

FIFTH DEFENSE
(Breach of Fiduciary Duty)

47. Licensee repeats, realleges and incorporates each of the preceding allegations as if set forth at length herein.

48. As set forth above, Licensee, Tri Global, Symon Garber, Valentina Zubok, and Galina Garber-Sheinin relied heavily on and trusted Capital One.

49. By virtue of the parties' business relationship as set forth above, and by reason of the demonstrable level of trust and confidence upon which Licensee, Tri Global, Symon Garber, Valentina Zubok, and Galina Garber-Sheinin depended and which Capital One knowingly accepted, Capital One owes certain fiduciary duties to Licensee, Tri Global, Symon Garber, Valentina Zubok, and Galina Garber-Sheinin including, without limitation, a duty of good faith.

50. As explained herein, for years Tri Global relied on Capital One to guide certain aspects of its taxi-medallion loan origination and servicing business. Although the Tri Global MJPA provided discretion to Capital One, that discretion did not include a right to abandon the lending market or purposely advance competing interests to destabilize the industry upon which the very loans that were being serviced were based.

51. Ultimately, Capital One repudiated its commitments to Licensee and abandoned the Chicago medallion lending market so that it could pursue a competing venture with Uber.

52. Capital One breached its duty of good faith, and the trust and confidence of Licensee by, among other things: precipitating, through its partnership with Uber, the collapse of the Chicago taxi medallion industry and the medallion industry nationwide, in addition to the corresponding decline in the value of the taxi medallions at issue.

53. Capital One engaged in an intentional course of wrongful conduct orchestrated to harm Licensee.

54. Capital One's conduct was willful, wanton and in reckless disregard of the Licensee's contractual rights and was otherwise wrongful.

55. As a direct and proximate result of Capital One's breach of its fiduciary duties, Licensee has suffered, and will continue to suffer, substantial damages.

SIXTH DEFENSE
(Breach of the Implied Covenant of Good Faith and Fair Dealing)

56. Licensee repeats, realleges and incorporates each of the preceding allegations as if set forth at length herein.

57. Pursuant to the covenant of good faith and fair dealing, Capital One could not undertake any action that has the effect of destroying or injuring the right of the other party to receive the fruits of the contract.

58. As explained herein, Capital One breached the duty of good faith and fair dealing implied in the contract with Licensee by, among other things: precipitating, through its partnership with Uber, the collapse of the taxi medallion industry and concomitant decline in the value of the taxi medallions at issue.

59. As a direct and proximate result of Capital One's breach of the implied covenant of good faith and fair dealing thereunder, Licensee has suffered, and will continue to suffer, substantial damages.

SEVENTH DEFENSE
(Estoppel, Waiver, Ratification and/or Acquiescence)

60. Licensee repeats, realleges and incorporates each of the preceding allegations as if set forth at length herein.

61. Capital One's claim of breach of contract / default is barred by the doctrines of estoppel, waiver, ratification and/or acquiescence.

CONCLUSION

WHEREFORE, based upon the foregoing allegations and defenses and all reasons appearing of record, Licensee has timely submitted a completed Affidavit of Defense and, pursuant to the BACP Taxi Rules, no transfer upon foreclosure may be allowed except pursuant to an order of a court having jurisdiction. Licensee respectfully requests that the BACP deny Creditor's Request to Transfer Taxicab Medallion License Upon Foreclosure.

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Valex Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Valentina Zubok

34 Waterview Ct.

Riverhead, NY 11901-6312

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 2149TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: Charles Boateng, for \$23,100 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

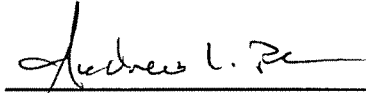
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Valex Cab Corp., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

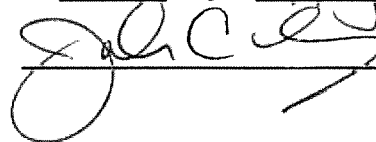
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified in Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 20 18.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 2149TX

LICENSEE NAME: Valex Cab Corp.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 2149TX either individually or through a company that I own and I have a defense to the foreclosure of these
licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs
List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public

**NOTICE OF CREDITOR'S REQUEST
TO TRANSFER PUBLIC PASSENGER VEHICLE LICENSE
UPON FORECLOSURE**

DATE: August 16, 2018

TO: *Via Regular and Certified Mail*

Valex Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

Via Regular and Certified Mail

Valentina Zubok

34 Waterview Ct.

Riverhead, NY 11901-6312

Via Regular and Certified Mail

Chicago Elite Cab Corp.

2617 S. Wabash Avenue

Chicago, IL 60616

**** IMPORTANT INFORMATION ****

This notice contains important information about your taxicab medallion license. The creditor who has a lien on your taxicab medallion license(s) claims that you have defaulted on your contract. The creditor is asking the City to transfer your license(s) to a purchaser at a sale conducted by the creditor. The City will transfer the license unless you stop the transfer by filling out and mailing the attached Affidavit of Defense form to the creditor and to the Department of Business Affairs and Consumer Protection.

The License

The Taxi Medallion License(s) hereinafter ("License") 1970TX, 622TX, 1952TX, 1653TX, 886TX are presently registered with the City of Chicago, Department of Business Affairs and Consumer Protection, in your name or the name of a company owned by you. The license is subject to a lien in favor of the following creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp., d/b/a Capital One Taxi Medallion Finance. The license was sold at foreclosure sale by the creditor on or about August 9, 2018 to the following person or company: COTMF NY LLC, for \$23,000 per medallion, plus applicable transfer taxes and fees.

The Creditor's Request

The Creditor says that you have not paid money which you owe to the Creditor or that you are otherwise in default of your credit agreement. The Creditor has therefore sold your license because of your failure to pay or because of this default. The Creditor intends to ask the Department of Business Affairs and Consumer Protection to transfer the license to the person or company named above.

**THE ONLY WAY YOU MAY STOP THIS TRANSFER IS BY SENDING THE
ATTACHED AFFIDAVIT OF DEFENSE TO THE CREDITOR
AND THE COMMISSIONER OF BUSINESS AFFAIRS AND CONSUMER PROTECTION.**

How to Find Out if You Have a Defense

You may assert any defense you have to 1) the amount claimed or owed on your credit agreement; 2) the foreclosure itself; or 3) the Creditor's right to foreclosure. You may also make any other defense to the Creditor's claim that is allowed by law. If you believe you may have a defense or if you do not know whether you have a defense to the Creditor's claim, it is suggested that you seek legal advice. Legal advice may be obtained from a referral by the Chicago Bar Association (312) 554-2001, The Legal Assistance Foundation of Chicago (312) 341-1070, and Legal Aid Clinics operated by local law schools including the Mandel Legal Aid Clinic of the University of Chicago (773) 702-9611, and the Northwestern University Legal Assistance Clinic (312) 503-8576.

The Affidavit of Defense

1. What It Is

The Affidavit of Defense is a form that tells the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense to the transfer of your medallion license. Sending an Affidavit of Defense does not mean that your license will be returned to you. If you file an affidavit of defense, the license will not be transferred unless the creditor obtains a court order.

**IF YOU DO NOT SEND AN AFFIDAVIT OF DEFENSE WITHIN THE TIME PRESCRIBED, YOU
MAY BE CONSIDERED TO HAVE AGREED TO THE TRANSFER OF THE LICENSE.**

2. What To Do

An Affidavit of Defense form is enclosed. If you want to tell the Creditor and the Department of Business Affairs and Consumer Protection that you believe you have a defense, you must complete this form. Then you must sign the form and have your signature notarized by a notary public. Remember, the Affidavit of Defense must be received by the Creditor or the Department of Business Affairs and Consumer Protection within **fifteen (15) days** from the date which this notice was mailed to you via certified mail.

3. Who To Send It To

After you have completed the Affidavit of Defense form and had your signature notarized, you must send the completed Affidavit of Defense form by certified mail to the Creditor and to the Department of Business Affairs and Consumer Protection. The Creditor's address is listed above. The address of the Department of Business Affairs and Consumer Protection is:

Department of Business Affairs and Consumer Protection
Public Vehicle Operations Division
2350 W. Ogden Avenue, 1st floor
Chicago, Illinois 60608
Attention: Monique Davids

You should save your certified mail receipts so you can show that you sent your Affidavit of Defense to the Creditor and to the Department of Business Affairs and Consumer Protection.

4. When To Send It

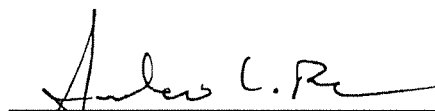
Do not wait to send the Affidavit of Defense form to the Creditor and the Department of Business Affairs and Consumer Protection. **THE AFFIDAVIT OF DEFENSE MUST BE RECEIVED BY THE CREDITOR AND THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION WITHIN FIFTEEN (15) DAYS FROM THE DATE WHICH THIS NOTICE WAS MAILED TO YOU VIA CERTIFIED MAIL.** If the Creditor or the Department of Business Affairs and Consumer Protection receives your Affidavit of Defense more than fifteen (15) days from the date upon which this Notice was mailed to you via certified mail, the license may be transferred.

I/We Troutman Sanders LLP hereby affirm that this Notice of Creditor's Request to
Creditor Authorized Agent Name
Transfer Public Passenger Vehicle License upon foreclosure was mailed to the above listed debtor/licensee
Valex Cab Corp., by certified mail, return receipt requested on this 16th day of August,
List Debtor Licensee Name
2018.

**A COPY OF THE RETURN RECEIPT MUST ACCOMPANY THE NOTICE OF
CREDITOR'S REQUEST TO TRANSFER THE PUBLIC PASSENGER VEHICLE
LICENSE WHEN IT IS SUBMITTED TO THE DEPARTMENT OF BUSINESS AFFAIRS AND
CONSUMER PROTECTION AT THE TIME OF APPLICATION.**

**IF THE NOTICE IS NOT ACCEPTED, YOU MUST FILE A COPY OF THE RETURNED
ENVELOPE AS PROOF OF SERVICE ALONG WITH THE AFFIDAVIT OF TRANSFER UPON
DEFAULT FORM WITH THE DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER
PROTECTION AT THE TIME OF APPLICATION.**

Respectfully submitted,



Name: Andrew Buck, Esq.

Troutman Sanders LLP
Law Firm

875 Third Avenue, New York, NY 10022
Address

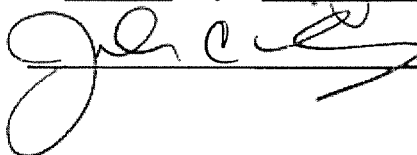
212-704-6000
Phone

andrew.buck@troutman.com
Email Address

JOHN C MURPHY
NOTARY PUBLIC-STATE OF NEW YORK
No. 01MU6346875
Qualified In Nassau County
My Commission Expires 08-22-2020

Subscribed and Sworn to before me

this 16th day of August, 2018.



Notary Public

AFFIDAVIT OF DEFENSE TO CREDITOR

To City: City of Chicago – Public Vehicle Operations Division
Department of Business Affairs and Consumer Protection
2350 W. Ogden Avenue, 1st Floor
Chicago, IL 60608
Attention: Monique Davids

To Creditor: Capital One Equipment Finance Corp., f/k/a All Points Capital Corp.,
d/b/a Capital One Taxi Medallion Finance
c/o Troutman Sanders LLP
Att'n: Andrew L. Buck
875 Third Avenue
New York, NY 10022

RE: PUBLIC PASSENGER LICENSE NUMBER(s) 1970TX, 622TX, 1952TX, 1653TX, 886TX

LICENSEE NAME: Valex Cab Corp.

I, _____, hereby swear that I own Taxicab Medallion License
Debtor Individual Name

Number(s) 1970TX, 622TX, 1952TX, 1653TX, 886TX either individually or through a company that I own and I have a
defense to the foreclosure of these licenses. I understand that this license(s) was sold at a foreclosure

sale on or about August 9, 2018 and that sale is contingent upon approval by the Department of Business Affairs

List Date of Foreclosure Sale
and Consumer Protection.

My defense to this foreclosure is: (Use additional pages if needed) _____

Signature: _____

Print Name: _____

Relationship to Medallion License/Title _____

Address: _____

Phone: _____

Email Address: _____

Subscribed and Sworn to before me

this _____ day of _____, 20 ____.

Notary Public